

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
NEWPORT NEWS DIVISION**

ROYCE SOLOMON, et al., individually and
on behalf of all others similarly situated,

Plaintiffs,

v.

AMERICAN WEB LOAN, INC., et al.,

Defendants.

Civil Action No. 4:17-cv-0145-HCM-RJK

CLASS ACTION

**PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

Plaintiffs Royce Solomon, Jodi Belleci, Michael Littlejohn, and Giulianna Lomaglio, on behalf of themselves and the proposed Settlement Class¹ (collectively, “Plaintiffs” or the “Settlement Class Representatives”), hereby move the Court pursuant to Fed. R. Civ. P. 23 for preliminary approval of the class action settlement involving claims against Defendants. Plaintiffs also move for certification of a class for the purposes of the Settlement, appointment of Settlement Class Counsel and Settlement Class Representatives, and approval of the form and manner of Notice to the Settlement Class. Plaintiffs further request that the Court set a Final Approval hearing for the final approval of the Settlement.

In support of this motion, Plaintiffs are filing contemporaneously with this motion a memorandum in support with the following exhibits:

¹ Unless otherwise defined herein, capitalized terms shall have the meanings ascribed to them in the Settlement Agreement dated April 14, 2020 (the “Settlement Agreement”), attached as Exhibit A to the memorandum in support filed herewith.

1. Exhibit A – Settlement Agreement and all supporting exhibits, including the proposed Notice forms, as well as a Proposed Preliminary Approval Order.
2. Exhibit B – Declaration of Former U.S. District Judge Layn R. Phillips In Support of Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement.
3. Exhibit C – Declaration of Kathleen M. Donovan-Maher In Support of Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement.
4. Exhibit D – Declaration of Matthew B. Byrne In Support of Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement.
5. Exhibit E – Declaration of David W. Thomas, Esq. In Support of Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement.
6. Exhibit F – Declaration of Eric Schachter, Settlement Class Administrator A.B. Data, Ltd.

Defendants do not oppose the filing of this motion.

DATED: April 16, 2020

MICHIEHAMLETT

/s/ David W. Thomas

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CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of April, 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to all counsel of record.

/s/ David W. Thomas

David W. Thomas